



## CRUMILLER P.C.

September 16, 2022

*Via Overnight Mail and ECF*  
Judge Eric N. Vitaliano  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: *Lieberman v. C.A. Goldberg, PLLC, and Carrie A. Goldberg*  
Case No.: 21-CV-05053-ENV-RER

Dear Judge Vitaliano,

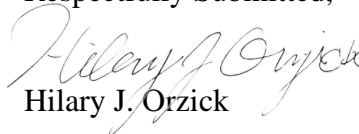
We represent Defendants C.A. Goldberg, PLLC and Carrie Goldberg (collectively, “Defendants”) and write pursuant to Rule III(D) of Your Honor’s Individual Motion Practice and Rules. Defendants hereby provide the Court with a courtesy copy of the fully briefed papers relating to Defendants’ motion for summary judgment, all of which were filed on ECF today. These papers include:

- Defendants’ Local Rule 56.1 Statement of Undisputed Material Facts in Support of Defendants’ Motion for Summary Judgment; partially filed under seal;
- Defendants’ Memorandum of Law in Support of their Motion for Summary Judgment
- The Declaration of Hilary J. Orzick in Support of Defendants’ motion, which attaches 67 exhibits, 55 of which were filed under seal;
- Plaintiff’s Local Rule 56.1 Counterstatement of Undisputed Material Facts in Opposition of defendants’ Motion for Summary Judgment, partially filed under seal;
- Plaintiff’s Memorandum of Law in Opposition to Defendants’ Motion for Summary Judgment; and
- The Declaration of Brian Heller, which attaches 41 exhibits, 35 of which were filed under seal;

- Defendants' Reply Memorandum of Law in Support of their Motion for Summary Judgment

We thank Your Honor for the Court's time and attention to this matter.

Respectfully Submitted,

  
Hilary J. Orzick

cc: Magistrate Judge Ramon E. Reyes, Jr. – via ECF  
Brian Heller – via email (w/o encl.)  
Davida Perry – via email (w/o encl.)